

Annual statement to the Independent Press Standards Organisation (IPSO)

From: Independent News & Media (Northern Ireland)

Period covered: 1 Jan 2015 – 31 Dec 2015

*INM Ltd
124-144 Royal Avenue
Belfast
BT1 1DN*

Introduction

Independent News & Media is the largest newspaper publisher in Northern Ireland, with offices currently situated at 124-144 Royal Avenue, Belfast (*note: during 2015 the company gave notice of intention to move from 124-144 Royal Avenue, Belfast within 12 months. At the time of writing the new address has not been officially confirmed*).

The company published the Belfast Telegraph and Sunday Life newspapers, which circulate in Northern Ireland, the associated website www.belfasttelegraph.co.uk and an iPad edition of the Belfast Telegraph. It also published a range of other digital products including NIJobFinder.co.uk, NICarFinder.co.uk and PropertyNews.com. The company is also a leading commercial printer, printing and distributing newspapers, including UK nationals, across Ireland.

Independent News & Media in Northern Ireland is part of Dublin-based Independent News & Media, publishers of the Irish Independent and other titles in the Republic of Ireland.

The publisher's responsible person for IPSO is managing director Richard McClean. The person with responsibility for the annual report is Paul Connolly, formerly group managing editor who is currently a freelance consultant who also holds the title of Readers' Editor.

Our editorial standards

INM fully subscribes to the principles of UK industry best-practice including IPSO's advice and guidance.

Editorially, our guiding documents are the Editors' Code of Practice, along with the Editors' Codebook, and training as given to journalists (including on recognised journalism courses). In the final weeks of 2014, the editors of both titles wrote to all reporters explaining about IPSO and the context of its work. They also reminded staff that IPSO operates a whistleblower's hotline for journalists who believe they have been asked to perform an unethical action. The latest version of the Editors' Code has been circulated to journalists.

At a corporate level, our guiding principles are contained in the group-wide policy document "*INM Plc – Code of Conduct*", a copy of which is included in this submission. This policy document sets out the standards of behaviour expected of all employees and includes an ethics telephone hotline for staff.

Both INM titles are happy to seek both pre and post-publication guidance from IPSO, as had previously been done with the Press Complaints Commission. Senior staff have been issued with daytime and out of hours phone numbers in particular for pre-publication guidance should it be required. Pre-publication guidance was sought on one occasion during Jan – Dec 2015; this involved a story about a teenager.

Editorial managers are expected to have detailed legal, ethical and regulatory knowledge. Although less prominent lately, the so-called Reynolds Principles are still viewed as having value and editors and their senior advisors are encouraged to include them in deliberations as and when appropriate.

In the small number of occasions where covert filming is deployed, mainly by Sunday Life

journalists, editorial managers are also expected to take special cognisance of rules and sensitivities, and to debate and record reasons why covert filming is permissible in advance of any such act as per the Editors' Code. Examples of Sunday Life covert filming include a brothel madam admitting she ran a sex-for-sale operation (footage of which was handed over to the PSNI). Editorial discussions regarding these matters are recorded in the Sunday Life news diary.

Verification of stories follows the standard journalistic model:

1. Information is gathered and evaluated
2. The editorial value is considered and a legal/ethical/public interest view is taken as required
3. A decision is made on whether to proceed with the pursuit of the story
4. A cornerstone of reporting is that, where at all possible, which is in almost all cases, the subject of the allegation is given adequate time to respond
5. Depending on response, a decision is then made on the merits of publication and whether the article meets the legal, ethical, editorial and commercial tests for publication.

Both the Belfast Telegraph and Sunday Life and other outlets have access to pre-publication legal advice from Belfast-based Carson McDowell solicitors including an evenings and Saturday/Sunday on-call service. This service is regularly called upon, particularly in difficult or challenging stories. Lawyers are of course given full details on the nature of information used and all attempts at verification. Final authority for publication rests with title editors.

Our complaints handling process

Complaints can be accepted in writing, email or telephone to reporters, senior executives, the editorial secretary or directly to editors. Reporters must escalate the complaint to a manager almost immediately. A complaints protocol exists which provides written instructions to staff on how to deal with complaints (**attached**).

Editorial complaints route, Belfast Telegraph: complaints are directed to the Editor, who has final say, but who delegates the day-to-day investigatory and procedural work to the Group Editorial Executive. This pattern is mirrored for both IPSO and non-IPSO complaints, where the Group Editorial Executive will investigate and report to the Editor.

Remedies can include corrections and verbal or written communications to the complainant defending, apologising etc as appropriate. The paper also has a Readers' Editor service which is empowered to accept and investigate complaints and who writes a weekly column in the paper and online.

It should be noted that Belfast has long been a litigious city – in many fields, not just in media law – with, in the eyes of many commentators, plaintiff-friendly libel laws (the Stormont administration refuses to extend the Defamation Act 2013). Many complainants go directly to lawyers, leading to a relatively high number of letters of claim, which are often the first the paper knows that anything is wrong. Indeed, several complaints to IPSO in 2015 came via law firms.

Editorial complaints route, Sunday Life: the system is similar to the Belfast Telegraph's although the Editor and News Editor are the key figures as Sunday Life does not have a Readers' Editor and the Group Editorial Executive does not deal with Sunday Life complaints.

Records of editorial complaints and their outcomes: All IPSO complaints and their outcomes are recorded on title complaints registers (**attached**), and all legal complaints are recorded on a single legal provisions risk register.

A non-IPSO complaints file was introduced by the Belfast Telegraph in 2015, which outlines non-IPSO/non-legal complaints received and actions taken.

How we seek to resolve editorial complaints: Wherever possible complaints are sought to be resolved by agreement with the complainant. Where this is not possible, the complaint is advised about IPSO, its work and given its contact details.

What information we provide to readers, and where, about internal and IPSO complaints processes: Print advertisements (examples attached) set out the complaints process to readers. Every web page also features a 'complaints' button which directs to a page titled: "How to make a complaint – Belfast Telegraph and Sunday Life". As with print, the thrust of this is to complain first to the Editor. If the complainant remains unsatisfied, there is also a direct link to IPSO's website.

Our training process

The following training was conducted in the relevant period:

- * Contempt of court seminars for reporters (delivered by McKinty & Wright solicitors)
- * Suicide Awareness course for reporters (delivered by the Public Health Agency and the Samaritans).

All editorial staff received an updated copy of the revised Editors' Code of Practice ahead of its introduction on January 1, 2016.

There are plans for training across INM (NI) in 2016. These include accuracy and balance in editing, captioning, proof-reading, the Editors' Code and recent updates to the Code.

The company met at a senior level with IPSO during 2015 and amongst other things stressed its enthusiasm to avail of any IPSO workshops that may be planned so these can be included in training strategies. INM officers said they had found previous PCC travelling workshops on standards/ethics, the Editors' Code and PCC 'case law' particularly useful and would encourage IPSO to revive the practice.

Our record on compliance

During the period in question, IPSO upheld one complaint against the Belfast Telegraph and one against Sunday Life. In both cases, the titles fully complied with IPSO's post-determination requirements in print and online as per INM's contractual obligations.

BELFAST TELEGRAPH

The register of complaints against the Belfast Telegraph which were adjudicated upon in the period is attached. One complaint was upheld. This (04893-15 Carroll v Belfast Telegraph) involved the re-publication of a correction. The title had published a correction following a complaint direct to the paper. However, the complainant was unhappy with its positioning on page 12 and complained to IPSO, which upheld the complaint and instructed the paper to publish it again on page 7, which it duly did.

SUNDAY LIFE

The register of complaints against Sunday Life which were adjudicated upon in the period is attached. One complaint was upheld. This complaint (00571-15 Thompson v Sunday Life) involved intrusion into private and family life and occasioned a breach of Clause 3 of the Editor's

code. The newspaper duly published the determination in line with the terms required by IPSO.

Attachments:

INM Code of Conduct

Protocol on receiving complaints

Belfast Telegraph IPSO complaints adjudications Jan – Dec 2015

Sunday Life IPSO complaints adjudications Jan – Dec 2015

Pages from Belfast Telegraph and Sunday Life with complaints advert

Screengrabs of web page with complaints button

The Reynolds Principles

Links to upheld complaints:

Belfast Telegraph

04893-15 Carroll v Belfast Telegraph:

<https://www.ipso.co.uk/IPSO/rulings/IPSOOrulings-detail.html?id=234>

Sunday Life

00571-15 Thompson v Sunday Life

<https://www.ipso.co.uk/IPSO/rulings/IPSOOrulings-detail.html?id=169>

COMPLAINTS PROTOCOL FOR ALL INM NI STAFF

INTRODUCTION:

This document sets out the protocol for all members of staff to follow for the receiving and referral onwards of complaints about articles published by Belfast Telegraph/Sunday Life, and the behaviour of its journalists.

It applies to ALL complaints whether received in person, by phone, letter or email.

PROCEDURE:

1. **INITIAL CONTACT:** The receiver must note and forward on the following: date/time, complainant's name, complaints address, phone number and email address (where applicable); nature of the complaint; date/page/headline/url of article complained of and a summary of the complaint. It is important that any threats of legal action are also noted.
2. **SUMMARY:** This must comprehensively note all aspects of the complaint including any comments made about standards and ethics of the newspaper and the behaviour of individual reporters (including if the receiver of the complaint is the reporter involved in publication).
3. **TONE:** The complaint should be received in a businesslike manner. It is not acceptable to be rude, hostile, indifferent, delaying, provocative, etc
4. **WORDS:** Words used to the complainant must reflect the Belfast Telegraph/Sunday Life's complaints policy. This is that "every complaint will be investigated and a response will be given to each and every complainant". Also that the newspaper "subscribes to the Editors' Code of Practice and to the press complaints body, IPSO". The complainant must be reassured that complaint will be treated seriously and will be passed to the editor or the editor's representative within two hours (or first thing in the morning if late at night).
5. **REFERRAL ONWARDS:** This must be done to your line manager as soon as possible, ideally within minutes. If a reply is not forthcoming, follow it up with a phone call for verbal confirmation. **NEVER ASSUME AN EMAIL HAS BEEN SEEN UNTIL YOU RECEIVE CONFIRMATION.** Keep confirmation emails in case these are required in the future.






INM (NORTHERN IRELAND)

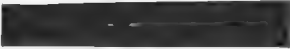

Belfast Telegraph IPSO complaints register

IPSO complaint, date, name and number	Details of complaint	Editor's Code clause	How the complaint was dealt with	Outcome
IPSO 01837-14 Date: 18.11.14 Gerry Adams TD	Hangover from PCC complaint "British" politician – BT campaign to undermine him	1. Accuracy 4. Harassment 12. Discrimination	Email Letters Solicitor etc.	Not upheld. Adjudication 02.02.15
IPSO 03108-14 Date: 23.12.14 Brenna Aston	Complaint about a column – use of word 'ban' and outdated lyrics quoted end to page 3 pics	1. Accuracy	Emails	Not Upheld Adjudication: 2.03.15
IPSO 03104-14 Date: 23.12.14 [REDACTED]	Complaint about a column – use of word 'ban' and outdated lyrics quoted end to page 3 pics	1. Accuracy	Emails	See Brenna Aston - IPSO found no breach of the code after investigation Not pursued
IPSO 00363-15 Date 30.1.15 John Graham	Complaint about a helpline not being available in NI misleading but MIND would have offered NI	1. Accuracy	Emails and phone calls	Not upheld but Belfast Telegraph published a correction in good faith 15 th April 2015

	numbers if called			
IPSO complaint, date, name and number	Details of complaint	Editor's Code clause	How the complaint was dealt with	Outcome
IPSO 00800-15 Date: 27.2.15 ? – no name Email address: [REDACTED]	Complaint re term “paramilitary-style shooting”	1. Accuracy	Emails	IPSO found no breach of the code after investigation 27 th Feb 2015
IPSO 0307-15 Date: 22.04.15 [REDACTED]	Girls' Brigade report re homosexuality is a sin equal to murder	1. Accuracy 2. Opportunity to reply	Emails	Not Upheld 7 th May 2015
IPSO 03527-15 Date: 08.05.15 Martin Galvin	Pejorative references to him by columnist. Inaccurate assertions	1. Accuracy 2. Opportunity to reply 12. Discrimination	Feb 3 Emails to BT April 2 solicitors let Letters, Email, solicitor letters	Published Right of Reply - resolved 22.11.2015
IPSO 00715-15 Date: 09.04.15 [REDACTED]	Re Letter published - unhappy with the way it was cut and the headline	2. Opportunity to reply	Letter and Emails	Not upheld 27 April 2015
IPSO 03497-15 Date: 07.05.157 [REDACTED]	Unhappy with Legal aid payment attributed to him – inaccurate No right of reply forthcoming	1. Accuracy 2. Opportunity to reply	Emails	Not pursued

IPSO 01492-15 Date: 26.06.15 [REDACTED]	Unhappy with letter re 'homosexuals not ready for marriage'	12. Discrimination	Emails	Not upheld 26 June 2015
IPSO 04311-15 Date: 30.06.15 [REDACTED]	Speculation by paper as to children screaming in coach accident - poor taste headline and photographs	1. Accuracy 3. Privacy 4. Intrusion into grief or shock	Emails	Not upheld 8 July 2015
IPSO 04473-15 Date: 29.07.15 [REDACTED]	Inaccurate repetition of Daily/Sunday Mail story subject of criminal proceedings; inaccurate rape claim and psychopath reference	1. Accuracy	Letter from complainant – he is in prison - and emails IPSO	Withdrew complaint in December 2015
IPSO 04893-15 Date: 6.8.15 Andy Carroll	Picture of Mr Carroll's house with inaccurate information – was rented by Sam Duff subject of story	1. Accuracy 3. Privacy	Email	Correction in paper Aug 6, 2015. Repeated correction p4 Oct 16 2015 as directed by IPSO. Also online correction
IPSO 05959-15 Date: 30.9.15 [REDACTED]	Unhappy with letter "Poles can't deny role in Auschwitz" 16.9.2015	1. Accuracy 12. Discrimination	Email	Breach of Editor's code didn't arise 6 th October 2015

IPSO 05956-15 Date: 29 .9.2015 	Unhappy with letter "Poles can't deny role in Auschwitz" 16.9.2015	1. Accuracy 1. Opportunity to reply 14. Confidential sources	Email	Breach of Editor's code didn't arise 2 nd October 2015
IPSO 05948-15 Date: 29.9.15 	Unhappy with letter "Poles can't deny role in Auschwitz" 16.9.2015	1. Accuracy 1. Opportunity to reply 12. Discrimination	Email	Breach of Editor's code didn't arise 2 nd October 2015
IPSO 05882-15 Date: 25.9.15 	Unhappy with letter "Poles can't deny role in Auschwitz" 16.9.2015	1. Accuracy	Email	Breach of Editor's code didn't arise 25 Sept 2015 he replied 25 Sept for review
IPSO 05875-15 Date: 25.9.15 	Unhappy with letter "Poles can't deny role in Auschwitz" 16.9.2015	1. Accuracy 2. Opportunity to reply 9. Reporting of crime 12. Discrimination	Email	Breach of Editor's code didn't arise 29 Sept 2015
IPSO 05791-15 Date: July 15 	Unhappy with letter "Poles can't deny role in Auschwitz" 16.9.2015	1. Accuracy 2. Opportunity to reply	Letter to IPSO	Breach of Editor's code didn't arise 30 October 2015

IPSO 05847-15 Date: 21.9.15 	Unhappy with letter "Poles can't deny role in Auschwitz" 16.9.2015	4. Harrassment 12. Discrimination	Email to IPSO	Breach of Editor's code didn't arise 30 October 2015
IPSO 07077.15 Date: 29.10.15 	Unhappy columnists calling Glasgow Rangers FC fans "the facist underclass" Comment piece Inaccurate	1. Accuracy 12. Discrimination	Email to IPSO	Breach of Editor's code didn't arise 4 November 2015

IPSO complaint, date, name and number	Details of complaint	Editors' code clauses	How complaint was dealt with	Outcome
Thompson v Sunday Life. IPSO ref 00571- 15. February 2 edition.	Complainant said the newspaper had intruded into his private life.	3 (Privacy) & 6 (Children)	Emails to/from complainant followed by investigation by Complaints Committee.	Committee found a Clause 3 breach, but no breach of Clause 6. By way of remedy it required publication of its adjudication. This appeared on June 28 and online.
██████ v Sunday Life. IPSO ref 04768-15. July 12 edition.	Complainant's solicitor pointed out factual error in report.	1 (Accuracy)	Emails to/from complainant's solicitor.	Resolved by an agreed clarification published on August 18.
██████ v Sunday Life. IPSO ref 06597-15. October 18 edition.	Complaint denied he had been convicted of a drunken assault on his estranged in 2009.	1 (Accuracy) 3 (Privacy) 4 (Harassment) 5 (Intrusion into grief) 9 (Reporting of crime) and 10 (Clandestine devices / subterfuge)	Emails direct to complainant, public statement by complainant issued to paper.	The complainant withdrew his complaint on receiving his police record and issued a statement saying he had had not been aware of his assault conviction.

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NEWS PAGE 8

Students urged to take new vaccine

Health Minister Hamilton warns of the dangers of meningitis



DEBATE NI PAGES 20-21

The Big Interview: Davy Adams

Former Loyalist leader talks about his charity work



LIFE PAGES 23-24

How kindness can do so much

Simple acts of generosity can make a huge difference



SPORT PAGE 56

Rea on brink of the world title

Ulster rider within touching distance of Superbike glory



Do you have a complaint about this newspaper?

The Belfast Telegraph is a part of the Independent Press Standards Organisation (IPSO). If you believe you have been unfairly treated you can contact IPSO in writing via its website for guidance on what to do. The service is free. IPSO can then advise on whether it's likely you have grounds for a complaint and what to do about it. The normal procedure is for the complainant to then contact the publication's Editor directly. If no agreement is reached, the complainant can go back to IPSO to look for an adjudication or for it to take over the complaint.

Full details are available at www.ipso.co.uk. Alternatively email complaints@ipso.co.uk or inquire@ipso.co.uk or telephone 0300 123 2220 or the out of hours emergency number: 07659 152 656.

You can also write to IPSO, c/o Halton House, 20-23 Holborn, London EC1N 2JD

WINNER OF PRESS & MEDIA AWARDS 2014 Newspaper of the Year

THE BELFAST TELEGRAPH ALSO WON: NEWSPAPER JOURNALIST OF THE YEAR, FEATURE JOURNALIST OF THE YEAR, BUSINESS JOURNALIST OF THE YEAR, SCOOP OF THE YEAR

WINNER OF PRESS & MEDIA AWARDS 2013 Newspaper of the Year

UK SOCIETY OF EDITORS' AWARDS 2012 Daily/Sunday Newspaper of the Year

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Farewell Cilla. There's a lorra lorra people who are going to miss you

BY ALEX DIAZ

GLORIA Hunniford has revealed her shock at the death of "national treasure" Cilla Black after the entertainer died suddenly at her home in the south of Spain.

Northern Irish broadcaster Gloria had seen her friend just two weeks ago at another friend's barbecue, and called her "a true icon".

Former pop star and television presenter Cilla, who lived in Estepona on the Costa del Sol, was 72.

Cilla — who had hearing problems and arthritis — reportedly died overnight after flying to Spain with her son Robert.

"Two weeks ago today we were at a mutual friend's barbecue and I just can't believe it, really," said Gloria.

"Cilla had little niggly things that were wrong with her, like her eyesight, hearing and a bit of trouble with her knee and walking — but then anybody over 70 will recognise all of those.

"But there was nothing that day only two weeks ago that would have suggested that she had anything that was life-threatening."

Fellow Northern Ireland broadcaster Eamonn Holmes said her death marked "another passing of a legend". "Always loved being in her company," he tweeted. "Condolences to Robert and family. She was a national treasure."

Former Beatle Paul McCartney, who is in Los Angeles, said: "Such a shock to hear about Cilla's passing. She was a lovely girl who infected everyone with her great spirit. From first meeting her as a cloakroom girl at the Cavern in Liverpool, to seeing her many times since,



Cilla Black with Gloria Hunniford at the TV Quick Awards

she always had a fun-loving dignity that made her a great pleasure to be around. "She had a fine distinctive voice and was always a bit of a laugh. It was a privilege to know and love her."

Former Beatles drummer Ringo Starr said: "I just heard the news Cilla Black has left us. She was a good friend we will all miss her. Peace to Cilla, peace and love to the family R&B xxx."

Sir Bruce Forsyth said he could not believe that Black had died at 72, as he still thought of her as a "kid".

The TV presenter and entertainer said that Black was loved by everyone and had the "common touch".

Born Priscilla Maria Veronica White in Liverpool, Cilla had said she would die happy if she passed away before illness could rob her of being able to enjoy life.

As the much-loved star approached her 71st birthday last year, she said that 75 might be an OK age to die.

She became one of the nation's favourite entertainers after transforming herself from a successful singer in the 1960s to the frontwoman on shows such as *Blind Date* and *Surprise, Surprise*.

An associate of The Beatles and their manager Brian Epstein in the early 1960s, she scored two number ones in 1964 — *Anyone Who Had A Heart* and

You're My World — as well as enjoying many other hits, before going on to concentrate on TV.

She hosted more than 500 editions of her programmes and was the first woman to have a prime-time chat show on BBC1.

Singer Sir Cliff Richard said he will dearly miss his "outrageous" friend, who was "full of heart".

Fellow presenter Christopher Biggins, who starred alongside Cilla in *Surprise, Surprise*, said: "She was a wonderful friend. She was someone who was a life force, she loved to laugh and loved to enjoy herself."

Lord Grade, former executive chairman of ITV, said a once nervous Cilla soon gained a natural confidence in front of the cameras and went on to become an "enduring family favourite".

He told Sky News: "She always felt like a friend in your living room when she was on TV. A magical lady."

Cilla's life was portrayed in an ITV biopic last year, which followed the story of the typist's rise to fame.

Cilla, which starred Sheridan Smith and pulled in more than seven million viewers, propelled the singer briefly back to the music charts with *Anyone Who Had A Heart*.

Smith said she was "absolutely devastated to hear the tragic news about Cilla. She was so kind and helpful to me, it was a privilege to play her."

'It's OK to pass away in your seventies'

BY HELEN WILLIAM

CILLA Black had spoken of how she would die happy if she were to pass away before any illness could rob her of being able to enjoy life.

As the much-loved entertainer approached her 71st birthday last year, she said that 75 might be an OK age to die.

She said: "Seventy-five is a good age to go, I still think that way. I don't want to linger. I don't want to be a burden on anybody. I know 75 is only four years away but I take each day as I find it."

Black, a singing star in the 1960s who turned into a TV legend with shows such as *Blind Date* and *Surprise, Surprise*, said: "The hearing is the bugbear, I now have an implant in my ear which

I have to turn off at night. I'm talking in an echo chamber at the moment. I guess that's just getting old — it'll come to you, too..."

She later told Radio Times she had made the remark after watching her mother go downhill in her old age.

Black said: "I meant that I didn't want to be like that, but I ain't going nowhere. I just thank God when I

wake up every day. I'm going to grow old disgracefully."

Black revealed she had turned down an offer to become a talent show judge. She said: "Today I'd be first in the queue for *The X Factor* and there's no doubt whatsoever that I'd win."

"I've been asked to be a judge but I couldn't because I wouldn't be able to tell the truth. The meanest I'd get is saying, 'It hasn't worked out this time, but go back and do your homework!'"

Black added that she would have liked to be made a Dame but she had not notched up enough serious acting roles.

"You don't become a Dame

INSIDE She was one of the great British entertainers DebateNI, Page 19

for doing what you enjoy, as I have, but if they want to give me one I wouldn't turn it down," she said.





So tough for border retailers

DONALD C McFETRIDGE

AS WE enter the final two weeks of Christmas trading, retailers on both sides of the border are battling it out for market supremacy.

In 2009, I gave an interview to BBC Radio 4 in which I pointed out that traders in border cities like Newry and Londonderry were experiencing an unheralded boom in the retail sector due to a marked increase in the number of southern shoppers travelling north to spend their hard-earned euros. The car parks in these cities were packed to capacity with southern-registered vehicles.

In fact, it has been variously estimated that, at the time, southern shoppers accounted for approximately 40% of trade in the leading supermarkets in these cities. However, this year the tables have been turned.

Due to the strength of sterling to the euro, it's traders in Dundalk and Letterkenny who appear to be experiencing stronger trading patterns. Of course, it's always been swings and roundabouts in respect of this issue, but this year it would appear that retailers in Londonderry and Newry are playing host to a sharply reduced number of southern shoppers.

In the past, retailers in border towns and cities used to offer southern shoppers premium exchange rates on the euro, in some instances even beating what was on offer in high street banks.

Historically, cities like Londonderry and Newry have relied heavily on cross-border trade, but this year they are experiencing a very perceptible slowdown in trade from places like Lifford into Strabane, Letterkenny into Londonderry and from Dundalk into Newry.

The principal problem this year is that not only are traders in our border towns and cities welcoming fewer southern shoppers, they are also experiencing "leakage" (losing out on indigenous trade due to the fact that there are more northern shoppers traveling south in search of bargains).

Christian retailing is of major importance for all retailers, but it is particularly important for our independent retailers as they seek to balance the books in what is still an extremely competitive and cut-throat market.

As everyone knows, empty tills are the first sign pointing to empty shops and more "to let" signs come January.

Donald C McFetridge is a retail analyst at the Ulster University business school

Christmas is the time to be merry, or so the song says. However, two stories in this newspaper today paint a very different picture of the festive season, highlighting the idiocy of those who drink and drive and the brutality of those who commit domestic abuse.

It seems incredible that after all these years of public education, including the use of graphic and memorable television advertisements, some people are still stupid enough to get behind the wheel of their car after drinking alcohol.

The old chestnut says that the most dangerous component in any vehicle is the nut behind the wheel, and that is certainly the case of the drunken driver who was caught with a child in their vehicle.

Another was nearly four times the legal limit and yet **another apprehended** was nearly twice the limit **an astonishing 11 hours** after

Telegraph

their last drink. At this time of the year, given the number of Christmas parties and the temptations to go for a drink after work, the police presence on our roads is greater than normal and their main target is drunken drivers. It is obvious that a driver's ability is impaired after drinking, yet that does not seem to deter many. Last year, 270 were caught during the winter police clampdown.

Anyone **tempted** to drink and drive should ask themselves several questions. Are you prepared to be caught, brought to court and lose your licence and, possibly your job **if it depends** on your ability to drive? Are **you willing** to risk your own life or, more

Importantly, someone else's life rather than take a taxi or go out with a driver who doesn't drink?

Turning to the other grim side of Christmas, domestic abuse, the number of incidents is astonishing. On Christmas Day and Boxing Day last year, 190 cases were reported to police. Alcohol undoubtedly played a part in many of those cases, but so did the constant pressures of the increasingly commercialised holiday season.

It is clear that behind the lace curtains of Ulster society all is far from well in very many homes. And the grim fact is that abuse is not a single occasion crime, but something which can be repeated very many times. Many victims do not report the abuse because of shame or fear, but police and other organisations are waiting and ready to help. Nothing excuses this crime and no one should put up with it.

No matter how many times the old mantra "A dog is for life, not just for Christmas" is repeated, there are still some who refuse to heed it and instead treat their pet like a disposable toy.

Dogs are expensive to look after, given the cost of injections and food and the long-term commitment required. But the rewards are great, as any caring pet owner will testify.

The Assisi Animal Sanctuary is looking to

re-home nine little pups — an unwanted litter left there. Any one of them would make a great Christmas present, but only for those willing to look after it for the rest of its days. Go on, be a dog's best friend this festive season.

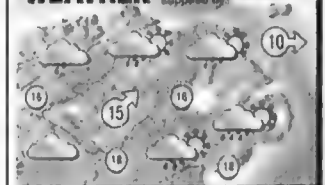
Do you have
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about this
newspaper?

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INSIDE YOUR

Sunday
Life**SUZANNE BREEN**Our columnist on Fr Brendan Smyth
and the evil of silence **Page 12****IVAN LITTLE**Horror lies and deceptions are emerging
from our darkest days **Page 20****WEATHER**Information supplied by **Met Eireann****TODAY**After drizzle to start, it will brighten up, but
with the risk of a shower. Gentle westerly
winds. Max temp 19C (66F).**OUTLOOK**Monday: Mostly dry, but cloudy.
Tuesday: Largely dry and sunny.
Wednesday: Partly sunny with showers.**LOTTERY RESULTS**

LOTTO 02 04 06 21 30 38 B 22

T'BALL 08 16 18 25 27 T 05

IRISH 01 02 07 22 35 45 B 04

Sunday Trader

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**WHITEROCK PARADE
PASSES PEACEFULLY**ALL QUIET ON THE WESTERN FRONT:
Parade makes its way through the
peaceful and (left) MP Nigel Dodds
and DUP leader Billy Hutchinson

By Christopher Woodhouse

**THE controversial annual Orange Order parade
in the Whiterock area of west Belfast passed off
without incident yesterday amid a substantial
police presence.**

Members of No 9 District Orange Lodge made their way through the security gate at the peacekeeping junction of Workman Avenue and the Springfield Road as dozens of nationalist protesters looked on.

They then marched along the Springfield Road to join the rest of the main band parade at the entrance to the former Mackie's site with dozens of nationalist residents staging a protest along their route.

Among those walking with the parade along the Springfield Road section was North Belfast MP Nigel Dodds, DUP councillor Brian Kingston, TUV councillor

**No incidents
reported at
Order march**

Jolene Bunting and DUP leader Billy Hutchinson.

Police commended those involved with the march and protest for their efforts to ensure it passed without incident.

"We had a significant policing operation in place to ensure the event passed

off successfully. I was encouraged by the calm and peaceful way in which the parade and associated protests were conducted," said Belfast City District Commander, Chief Superintendent Nigel Grimshaw.

"I want to commend those involved for their efforts in ensuring the day was a success."

Yesterday's Whiterock parade was the first real test for the UDA and UVF since announcing they had withdrawn support to keep the peace on the Twelfth.

The strategy was again

discussed during a meeting in the Taughmonagh estate of south Belfast last Wednesday attended by more than 100 UDA and UVF figures.

A source at the meeting said: "Everyone agreed to work together to ensure the trip through the town and up the Lisburn Road is peaceful."

"It was about keeping a lid on things as the bands and Orangemen walk up the Lisburn Road to the field."

"But after that it is a matter for the police to take care of things."



TALKS: Joe Clarke and Moazzam Begg

**EX-DETAINEES
WILL SPEAK AT
TORTURE EVENT**

A FORMER GUANTANAMO Bay detainee will join a millionaire lotto winner interned during the Troubles to give a lecture about Britain's involvement in the torture of prisoners.

Lotto winner Joe Clarke and former Guantanamo Bay inmate Moazzam Begg will be speaking at an event organised by republican prisoners' group Cogus, part of the dissident Republican Network for Unity (RNU).

Clarke, 60, was one of the 13 Hooded Men who were subjected to extreme interrogation after being interned by the government in 1971.

Three years later he was one of 11 people awarded £12,500 each in damages for their treatment at the hands of the Army while in the Long Kesh camp.

In January 2013, the car mechanic from west Belfast scooped £10 million in a Euro-millions jackpot win.

Moazzam Begg was arrested in Pakistan in February 2002 and held for three years in the notorious US military base at Guantanamo Bay in Cuba.

Also speaking at the event is Jim Auld who was also one of the Hooded Men tortured while imprisoned by the Army.

None of those taking part could be contacted.

But DUP MP Jeffrey Donaldson told Sunday Life that the event lacked balance without input from victims of terrorism.

"If we are to move towards a Northern Ireland that has a better understanding of its past we really do need to see a much more balanced approach to these things."

The lecture is due to be held at the Conway Mill, off the Falls Road in west Belfast, on Aug 8.

**CORRECTIONS AND CLARIFICATIONS
REPORT ON CLERIC BAFFLED BY FALSE RUMOURS: IPSO COMPLAINT UPHeld**

FOLLOWING an article published in Sunday Life on 3 February 2015, headlined "Tyron cleric baffled by false gay rumours", Rev Peter Thompson complained to the Independent Press Standards Organisation (IPSO) that Sunday Life had intruded into his private life in breach of Clause 3 (Privacy) of the Editors' Code of Practice. IPSO upheld the complaint and established a breach of the Editors' Code. IPSO required the Sunday Life to publish this decision by its Complaints Committee as a remedy to the breach.

The article reported that the complainant was "baffled" by "false rumours" that he had been cautioned by police, and also that he was homosexual.

The complainant said that the publication of these rumours, which were personal in nature, was a breach of his privacy. He said that he had confirmed to the newspaper prior to publication that the claims were untrue and unsubstantiated.

The complainant had been contacted for his comment prior to publication, and had contacted the Church of Ireland Press Office to confirm the identity of the journalist before returning her call.

SUNDAY LIFE strives for complete accuracy in everything it publishes. However, sometimes mistakes do happen. We aim to publish corrections and clarifications and resolve any complaints quickly. If you need to raise a complaint with us, directly please email us at complaints@sundaylife.co.uk. Sunday Life has not contacted a named third party, IPSO, to investigate your complaint. You can contact IPSO to complain about our content at www.ipso.co.uk or writing via its website for free guidance on what to do. Full details of how to make a complaint are available on the IPSO website at www.ipso.co.uk or on our complaint page www.sundaylife.co.uk/complaints. The telephone number is 0300 123 2220.

The complainant was concerned that the newspaper had sought to use his categorical denial of the allegations in that conversation as justification for circulating them further.

The newspaper had become aware

of the rumours after being contacted by an unknown source; it then followed up on the rumours with a person who was familiar with them.

The newspaper said that the article was in the public interest: the complainant was a prominent local figure, and the allegation that he had a police caution was of a very serious nature. With regard to the rumours about the complainant's sexuality, the newspaper said that the complainant had willingly responded to the journalist's questions following consultation with the Church of Ireland Press Office, and at no point said that his comments were not for publication.

The newspaper said that the article clearly concerned the complainant's private life, and that it would not be its usual practice to contact individuals regarding claims about their sexual orientation. However, the complainant was a prominent member of his local community, fulfilling a pastoral role, and it appeared at the time that he was the victim of a campaign. The newspaper believed that it was reasonable to conclude that the complainant wanted to take the opportunity

to publicly address the claims about him. Nonetheless, the newspaper removed the article from its website as a gesture of goodwill. It also said that it had not wished to cause further distress to the complainant, and assured him that it would not report anything further about this matter, unless related criminal proceedings came before the courts.

IPSO's Complaints Committee made clear that details of an individual's sexuality form part of private and family life and as such receive protection under the terms of Clause 3 of the Editors' Code. The complainant had not publicly disclosed the fact that rumours of a personal nature had been circulating about him, and the newspaper had become aware of them only after being contacted by an unknown source. The inclusion in the article of his denial was insufficient to justify the intrusion into the complainant's private life caused by publication of the claims, regardless of their inaccuracy. Further, the complainant's rebuttal of the allegations in conversation with the journalist did not constitute consent for publication under Clause 3 (ii). The newspaper breached Clause 3 of the Code.

INSIDE YOUR Sunday Life

SUZANNE BREEN

How the 'PC brigade' turn a blind eye to Islamic injustices **Page 12**



IVAN LITTLE

Ivan reveals how death threats to cartoonists are nothing new **Page 20**



SHOWBIZ LIFE

Kim Kelly brings you the latest celeb news and gossip **Pages 26&27**

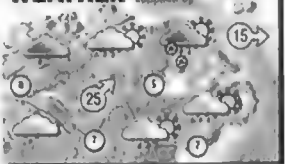


DAN GORDON

Our man Dan reckons fame isn't all it's cracked up to be **Page 30**



WEATHER



TODAY

Mostly cloudy and windy with wintry showers giving way to spells of rain. Strong to near-gale force winds. Max temp 8C (46F).

OUTLOOK

Monday: Windy with a few showers.
Tuesday: Windy with wintry showers.
Wednesday: Windy. Rain and sleet.

DO YOU THINK THIS NEWSPAPER HAS TREATED YOU UNFAIRLY?

Sunday Life is a part of the Independent Press Standards Organisation (IPSO). If you believe you have been unfairly treated or have a significant complaint you can contact IPSO in writing via its website for free guidance on what to do. IPSO can then advise on whether it's likely you have grounds for a complaint and what to do about it.

The normal procedure is for the complainant to then contact the newspaper directly, setting out the grounds for the complaint. IPSO will allow up to 28 days for the publication and the complainant to come to an agreement about the complaint and any remedy required.

If no agreement is reached, the complainant can go back to IPSO to look for an adjudication on the matter or to take over the complaint. This service is also free.

Full details of how to make a complaint are available on the IPSO website at www.ipso.co.uk or email complaints@ipso.co.uk or inquiries@ipso.co.uk.

The telephone number is 0300 123 2220 and there is an out of hours emergency number: 07659 152 656.

You can also write to Independent Press Standards Organisation, c/o Halton House, 20-23 Holborn, London EC1N 2JD.

The Editor of Sunday Life can be contacted at 124-144 Royal Avenue, Belfast BT1 1EB.

RING OUR NEWSDESK WITH YOUR STORIES

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BLAIR FACES QUIZ OVER KINGSMILLS

Lynda's not likely to stand for seat

By Alan Murray

FORMER UTV presenter Lynda Bryans is not expected to seek the Uist Unionist Party nomination for the East Belfast Westminster seat when the local constituency association considers candidates on Thursday night.

Only Castlereagh councillor Chris McImpney and businessman Tim Lemon have so far indicated an interest in seeking the nomination, party sources have revealed.

Speculation that the former UTV presenter would seek the nomination was fuelled by a Sunday Life report in October suggesting that the mother of two was considering standing for parliament.

Her husband Mike said that the couple would discuss the merits of her entering the political fray over the breakfast table.

The UUP leader described the suggestion as "a matter for speculation" but added to it by saying, "I have no doubt whatsoever she would be an outstandingly good elected representative. She is also, of course, both popular and trusted."

One senior association figure told Sunday Life: "Chris and Tim are the only ones seeking the nomination at this point. Lynda's name is not on the list. It will be up to the party officers to decide whether we contest this seat and the South Belfast seat and other seats."



SPECULATION Lynda Bryans has not yet said her name is on the list.

By Darwin Templeton

TONY Blair will this week be asked to explain how two suspects linked to the Kingsmills massacre got "comfort letters" from the government.

Conservative MP Laurence Robertson said that he would put the issue to the former Prime Minister when he appears in front of the Northern Ireland Affairs committee on Tuesday.

It emerged last month that two men who were linked to the murder of 10 Protestant workers in 1976 had been informed in 2007 that they were not wanted for prosecution.

Mr Robertson said that Mr Blair would be facing questions about issues that have emerged since the collapse of the trial of John Downey for the Hyde Park bombing last year.

He said: "It's not just about Downey - since then we have learned that two people suspected of being involved in Kingsmills received letters, one of whom is now dead."

MURDERS

"There are also the 96 that [PSNI chief] Drew Harris identified as having been linked to almost 300 murders, who also received letters."

"We will want to press him on these issues."

DUP MP David Simpson said that Mr Blair would be challenged on his "deliberate deception" over the on-the-run scheme.

He said a letter from the ex-PM's chief of staff in 2000 seemed to suggest he had told Gerry Adams the on-the-run issue would be dealt with "within four weeks".

Mr Simpson said: "It is vital that he tells the committee exactly why such herculean efforts were made not just to put this scheme in place, but to keep it in absolute secrecy."

"It has been a long fight to bring Tony Blair before this Committee and now that he has finally been

Former PM to be asked about suspects linked to 1976 killings

cornered into giving evidence it is vital that he gives some answers."

MPs are investigating the controversial scheme which came to light when John Downey's trial for the Hyde Park bombing, in which four soldiers were killed, collapsed last year.

Downey had wrongly been given a letter of assurance which told him that he was not wanted by police.

It has emerged that MPs are also now going to question the civil servant who signed Downey's comfort letter.

Mark Sweeney, a senior NIO official at the time, was due to have given evidence last week with colleague Simon Case, but the hearing had to be postponed.

The NIO has now indicated that the civil servants will make themselves available at a joint session alongside the Secretary of State Theresa Villiers and permanent secretary Sir Jonathan Stephens.

Flu crisis would floor our NHS system, warns doc

THE health service will not cope in the event of a flu epidemic in Northern Ireland, a leading medic has warned.

Dr Tom Black, a Londonderry GP, was speaking amid chaotic scenes in hospitals across Northern Ireland.

Hundreds of operations have been cancelled this past week in an effort to free up beds and extra staff have been drafted in to look after patients.

One hospital employee said: "Staff are at breaking point, they can't take much more."

However, Dr Black from the British Medical Association said: "This is all going on and there hasn't been a flu outbreak yet."

"There was an 18 per cent increase in demand on the GP out-



INCREASE IN DEMAND: Hospital beds in NI

of-hours (OOHs) service over a 10 day period over Christmas and New Year compared to the same period last year.

"Given that we have seen such a large increase in consultations in OOHs and the same level of demand on GP in hours, I don't think we could cope with a flu epidemic."

Dr Black said GPs would be forced to implement special measures to deal with patient numbers in the case of a flu outbreak under current circumstances.

"It could get to the point where we have to triage all patients by telephone to decide who actually needs to come in and see us in person," he explained.

He urged people to only contact their GP when necessary.

"We need patients to self care to a greater degree if we are going to be able to care for people who genuinely need our attention," he said. Health bosses have

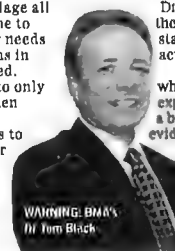
urged anyone who has not yet received the flu vaccine to contact their GP in coming days.

The Public Health Agency (PHA) has said the vaccination provides the best protection for at risk people.

Dr Richard Smithson from the PHA said: "Flu levels are starting to increase here so act now."

"You can never be sure what flu will do, but many experts think this could be a bad winter flu season and evidence is already emerging

in other countries that backs this up, so we would urge the public to play an active role in protecting their own health and get the flu vaccine."



WARNING: BMAs Dr Tom Black

LOTTO RESULTS
THUNDERBALL
IRISH LOTTO

18 14 24 41 39
 14 20 34 38 10
 06 07 30 39 08

PICK UP YOUR FREE COSTA COFFEE TODAY
 TURN TO PAGE 37 FOR YOUR VOUCHER

How to make a complaint - Belfast Telegraph and Sunday Life

PUBLISHED
01/01/2015



This website and its associated newspapers adheres to the Independent Press Standards Organisation's Editors' Code of Practice.

If you have a complaint about the editorial content of the Belfast Telegraph or Sunday Life - which relates to inaccuracy or intrusion, then contact the Editor at the address below.

SHARE



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If your complaint relates to content that has appeared on belfasttelegraph.co.uk but not in print please email

digital.editorial@belfasttelegraph.co.uk

If you remain dissatisfied with the response provided then you can contact the IPSO by [clicking here](#).

The Reynolds Principles

The Reynolds principle was established by the case of *Reynolds v Times Newspapers* [1999]. Although it has been overtaken, legally speaking, it is felt that it remains a useful tool for journalists when assessing the editorial value of an article.

Lord Nicholls in his judgment set out ten “illustrative circumstances” which should be considered. They were:

- The seriousness of the allegation. The more serious the charge, the more the public is misinformed and the individual harmed, if the allegation is not true.
- The nature of the information, and the extent to which the subject-matter is a matter of public concern.
- The source of the information. Some informants have no direct knowledge of the events. Some have their own axes to grind, or are being paid for their stories.
- The steps taken to verify the information.
- The status of the information. The allegation may have already been the subject of an investigation which commands respect.
- The urgency of the matter. News is often a perishable commodity.
- Whether comment was sought from the plaintiff. He may have information others do not possess or have not disclosed. An approach to the plaintiff will not always be necessary.
- Whether the article contained the gist of the plaintiff's side of the story.
- The tone of the article. A newspaper can raise queries or call for an investigation. It need not adopt allegations as statements of fact.
- The circumstances of the publication, including the timing.



Independent
News & Media PLC

INM Plc. Code Of Conduct

Date of Issue	Version
June 2014	V 1.2 Updated June 2014



A Message From Our CEO

In INM we believe that business should be built on trust and integrity, on ethical performance and on respecting and safeguarding the interests of the wider community. Getting ahead through unethical actions is never acceptable.

The code set out in the following pages details the values and behaviours that we expect of our employees. It offers guidance on key ethical areas which one may encounter in our day to day business dealings. It is not meant to be an exhaustive list and is no substitute for common sense. Please take the time to review this code and consider its contents.

Ethical dilemmas can often be complex. If in doubt or if you need further clarification talk to your manager. If you do become aware of unethical behaviour I strongly encourage you to report it through one of the channels outlined in the section on obtaining advice and raising concerns. No employee will be penalised or retaliated against for raising a concern in good faith.

INM believes that strong values and principled leadership are crucial to the on-going success of our business. As employees of INM we should always be mindful of the responsibilities that we have to each other and to our stakeholders. With this in mind it is essential that we conduct our business with the highest standards of ethics and integrity at all times.

Thank you,

Vincent Crowley (Chief Executive Officer)



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Introduction

INM is committed to maintaining the highest standards of ethical behaviour. Business operations within INM are often complex and good ethical behaviour does not boil down to a series of do's and don'ts. Even the appearance of improper behaviour can have serious repercussions on INM's reputation. This code outlines some of the key principles underpinning ethical behaviour in INM. It applies to all employees (which for the purpose of this code includes agents, contractors, consultants, board members and any other parties representing/performing services on behalf of the INM Group).

You should familiarise yourself with this code and apply the principles in your day to day business dealings in INM. Managers have additional "dos" and "don'ts" to promote the code. They should lead by example and ensure that employees under their supervision are aware of our ethical values. Managers should be supportive of those individuals who raise questions in this area or have ethical concerns.

The code is by no means exhaustive and serves to act as a guide in this area. Ultimately the ethical culture of INM depends on the moral standards of its employees, their ability to exercise good judgement and their willingness to flag ethical concerns when they arise.

This code may be amended from time to time and any revised version of the code will be published on the Group website.



Our Responsibilities

We are committed to acting in the best interests of our stakeholders which includes:

Commitment to our employees

INM's growth as a leading international newspaper and communications group has been underpinned by the dedication and commitment of its employees. We recognise that they are central to our organisation. We embrace diversity, seek to reward performance and are actively committed to promoting the well being of our employees.

Commitment to our customers

The core philosophy of our business continues to be meeting our customers' needs. From its local Irish newspaper origins, the INM Group has expanded across the globe to encompass a multi-ethnic, geographically and culturally diverse audience. While our product offering has expanded to include printing, distribution, wholesaling and education our commitment to offering the highest level of quality and service to our customers remains steadfast.

Commitment to the market place

We aim to compete vigorously but fairly in the market place and in a manner that complies with all relevant laws and regulations.

Commitment to our shareholders

In INM we are guided by our duty to act in the best interests of INM and our shareholders. By promoting long-term stable growth the business aims to build enduring shareholder value. We recognise that our relationship with our shareholders is built on trust and transparency. We are committed to maintaining the highest standards of corporate governance and ensuring the correct mix of experience at Board level, for the optimum strategic and operational governance of the INM Group.

Commitment to our community

From the outset the INM Group has always been acutely aware that no organisation can survive, let alone flourish, in a vacuum, without reaching beyond itself to make a deeper contribution to the well being of society. This commitment is at the heart of the INM Group's ethos and underpins how we conduct our business, mindful of our corporate, social and environmental responsibilities to sustainable development.



Our Commitments in Action

Commitment to our employees

Discrimination and Harassment

We recognise that our employees are one of our greatest assets. They are the face of our business and, combined with our market-leading brands, are the point of recognition for our many millions of consumers.

Our human resource policies reflect the central role that our employees play in our organisation. These policies focus on ensuring equal opportunities for all and promote diversity through our workforce to the greatest possible extent. We aim to positively engage with employees in a way that will assist them to achieve their maximum potential.

Individuals within INM have the right to work in an environment which is free from discrimination and harassment. Employees should be treated with respect and dignity at all times. All of our employees are recruited and promoted on the basis of suitability for the job.

Discrimination/harassment on grounds such as age, race, religion, gender, sexual orientation, marital or family status, disability or, in Ireland, membership of the traveller community is unacceptable and employees who are found to be in breach of this principle may be subject to disciplinary action.

Both managers and employees in INM are responsible for creating and maintaining a workplace free from discrimination and harassment.

If you are subject to harassment or feel discriminated against, please speak up by using one of the resources listed in the section on “obtaining advice and raising concerns”. INM does not tolerate retaliation against any employee who reports a concern in good faith, even if that allegation is found to be unsubstantiated.

Personal Information

The business is mindful of the fact that it holds confidential and sensitive data relating to its employees. Appropriate measures should be in place to ensure that such information is protected and never used for improper means. Personal information should always be managed in accordance with our employment policies, relevant data privacy and protection laws and best practice.

Health and Safety

We are committed to safeguarding the health and safety of those people who work in or visit our organisation by providing appropriate training and professional expertise where required. In addition, each of us has an individual responsibility to ensure that health and safety is never compromised. To maintain a safe working environment employees are expected to:

Comply with all applicable local legislation in this area;



- Follow guidelines issued by the business with regard to health and safety;
- Understand the hazards associated with their job and workplace and ensure that they are being adequately managed;
- Ensure that employees and contractors work in a safe manner and use appropriate health and safety equipment as required;
- Never work while under the influence of alcohol, illegal drugs or misused prescription drugs;
- Raise any health and safety concerns that they become aware of even if it is not within their area of responsibility; and
- Report accidents, near misses, breaches of health and safety as soon as possible.



Commitment to our customers

Editorial principles

A newspaper's greatest assets are its integrity and credibility. INM requires its editors and editorial staff to be professional, courageous and aggressive in pursuit of truth in the news. It is also committed to independence, fairness and balance in informing people of events and issues which they have a right to know. This right is balanced by compliance with the laws of defamation and privacy and adherence to the principles of taste, balance and accuracy. INM titles will not promote or encourage illegal activities or violence to achieve or further political objectives or foment violent activities aimed at undermining the lawful institutions of the country. These principles apply equally to content disseminated via the web, mobile and other electronic devices.

Confidentiality

As part of our business relationship with our customers we are entrusted with personal and sensitive data. Subject to any legal requirement to disclose information, we are committed to ensuring that such information is safeguarded at all times, is never shared with unauthorised parties and is maintained in accordance with relevant data privacy and protection laws as well as best practice. Employees are expected to be mindful of their responsibilities in this area and should ensure that the usage, storage and transfer of such information is managed effectively and securely and in accordance with this code and any policies that may apply from time to time.

Marketing and Promotion

We should ensure that all sales and promotion practices are truthful, balanced and do not mislead our customers. Any competitions should be conducted in a manner which is open, honest and legal.



Commitment to the marketplace

Competitive information

We should ensure that any information we obtain regarding competitors activities is ethical and in compliance with local laws and regulations. We should never use improper means to obtain unauthorized or confidential information about our competitors. This can include deception, obtaining information from current or former employees of competitors, relying on personal or professional relationships or offering inducements to gather information on a competitor which is not in the public arena and which would be considered sensitive.

Colluding with competitors

We should never enter into an arrangement with competitors, formal or informal, with the intent or effect of limiting competition. Such an arrangement could include setting prices, fixing terms and conditions, limiting production, dividing up markets or boycotting customers and/or suppliers. Given that INM engages with its competitors as part of its service offering, we should be highly vigilant that any dealings with competitors do not contravene local competition laws. Violating these laws can have severe implications for both our organisation and individuals involved. Given the complexities in this area you are encouraged to raise any concerns you may have on this area with your manager.

Communications

As a business we need to ensure that information disseminated to the public is accurate, consistent, timely and in compliance with local laws and regulations. To protect our company's reputation it is important that external communications are handled by designated spokespeople for the INM Group. We should not make any representations on the INM Group's behalf unless it is part of our job responsibility or where instructed to do so by our manager. If any employee has any doubts regarding communication of information to external stakeholders they should consult with their manager.



Commitment to our shareholders

Company assets

Company assets such as cash, inventory, computers, telephony, and IT hardware and company vehicles are an essential element of INM operations. We should ensure that these company assets are used appropriately and for purposes intended. Proper measures should be in place to protect them from loss, theft, damage and misuse. Electronic communication systems within INM should be used sensibly. It is unacceptable to use INM systems to send unauthorized communications or conduct business for another organization. Under no circumstance should we use INM systems to view or download content that is illegal harassing or insensitive. Employees should have regard to any applicable local laws and company policies on email and internet use. When using these systems, your rights to privacy are limited. Usage of INM's information systems may be subject to monitoring to protect our business, reputation and equipment from misuse. Intellectual property such as trademarks, content, copyrights, domain names, trade secrets and other assets provide INM with a competitive advantage over its competitors. We should take all reasonable steps to ensure that INM's intellectual property is protected. We should also respect the intellectual property of others and ensure it is not infringed.

Accurate and complete records

A wide range of stakeholders including investors, banks, tax authorities, customers and suppliers rely on the integrity of our disclosures and business records. Incomplete or inaccurate information impacts on our credibility and reputation. Falsifying or misrepresenting information can constitute fraud.

Employees within INM must ensure that records maintained are accurate, timely and complete. Inflating key metrics such as sales or circulation, shifting results between reporting periods or maintaining off balance sheet accounts is never acceptable and can result in investigations, fines, legal actions and significant damage to reputation (as well as disciplinary action for the relevant employee). If you suspect a potential problem in this area you are encouraged to raise your concern through the relevant channels outlined in the section "Raising a concern". Within INM there is a policy of no retaliation. This means that INM will not penalise or tolerate retaliation against any employee who reports a concern in good faith, even if that allegation is found to be unsubstantiated.

Confidential information

Confidential information is information which is not available to the public and can take many forms such as strategic plans, intellectual property, and financial information, contractual arrangements with suppliers and business partners and subscriber details. We must take reasonable steps to ensure that confidential information is adequately safeguarded. Such information should never be used for purposes other than legitimately carrying out one's job (and then, only for the purpose for which the information was received) and should only be shared with internal and external parties who have been authorised to receive such information. In safeguarding confidential information we should:

- Ensure that information held is accurate and current;
- Take reasonable steps to secure confidential information;
- Communicate information only to those who are authorised to receive it;



- Be mindful of discussing sensitive information in public; and
- Ensure that information is held in accordance with data privacy and protection laws and any special requirements that may apply to the relevant information (e.g. where the information is subject to restrictions under a non-disclosure or confidentiality agreement)

Insider trading

Inside information relates to non public information which would be likely to significantly influence an investor's decision to buy, sell or hold securities in that company or to affect the price generally of securities or related securities in that company. The use or disclosure of inside information to make investment decisions is illegal in many countries. Examples of inside information can include financial results, new products, changes in the Board and acquisitions and divestures (or any plans or information with respect thereto).

As part of our work, we may become aware of inside information relating to INM or companies that it does business with. We should never use such inside information or share it with others for the purpose of making an investment decision until such information has become public (even after an employee or agent no longer works with INM or the INM Group).

Employees are prohibited from spreading false or misleading information about the company or engaging in activities designed to manipulate the price of securities in INM. Breach of this principle may result in disciplinary action. The above applies to INM or any its subsidiaries or investments that the inside information pertains to.

Conflicts of interest

A conflict of interest may occur when our personal interests interfere, or appear to interfere, with our ability to perform our jobs effectively and without bias. We are expected to act in the best interests of the INM Group as well as, in the case of directors, in accordance with fiduciary duties owed to those companies on which a director sits on the board. Business decisions should not be affected by our personal interests that could arise as a result of financial interests in suppliers, competitors or customers. We should not work simultaneously for a competitor, customer or supplier without obtaining the necessary authorisation from our manager.

In order to avoid potential conflicts of interest we should be mindful of any business arrangements where family members or close personal relationships may be involved. These relationships can include but are not limited to relatives, spouses, partners, in-laws and individuals living at your address. We must not put ourselves in a situation where such relationships could interfere with our ability to make objective decisions. Any arrangements where you have a direct/indirect reporting line with any of the above parties should be communicated to your manager.

Even the appearance of a conflict of interest may lead to reputational damage. If you have a potential conflict of interest or need clarification on this matter consult your manager for advice. Alternatively refer to the section "Raising a concern" for other channels through which you can raise concerns.

Records management

Good records management is important for effective and efficient operations as well as protecting important and sensitive information. Records can take many forms including written,



printed, and recorded materials, as well as electronic records (i.e., emails and documents saved electronically). Records should be managed in accordance with business, legal, financial and regulatory requirements and with any INM specific records management policies applicable from time to time.

Where records contain information relating to a current or anticipated legal or regulatory action they should be preserved even if they would normally be destroyed.

Records should not be held for longer than expected. When destroying records we should exercise care. Paper documents should be shredded or rendered unreadable. Electronic records should be erased. If you have any questions on the area of records management please consult your manager.

Co-operating with auditors

During the course of its business INM is subject to internal and external audits. These include financial reporting, ABC circulation and tax audits. We are expected to fully co-operate with auditors. Falsifying business records, withholding information, making misleading statements or otherwise interfering with an audit is a violation of the code and may lead to disciplinary action.



Commitment to our community

The Law

INM believes in full compliance with both the spirit and letter of the law in the countries in which it operates. Failure to adhere to local laws, rules and regulations can result in investigations, fines, penalties and damage to our reputation. Where our policies and procedures are in conflict with the law we should always follow the law. Employees are not expected to be knowledgeable of every aspect of the law but should be aware of any legal or regulatory requirements which apply to their job. Where in doubt you should seek clarification from your manager.

Social responsibility and environment

As a global multimedia company that reaches millions of consumers each week, we are in a unique position to make a real difference to the communities in which it operates. The INM Group has an extensive track record of supporting large-scale humanitarian causes on both a global and local basis. It supports a wide variety of charitable organisations by making financial contributions and by providing editorial coverage. It also provides significant editorial coverage and support for environmental and health issues.

INM recognises its responsibility in safeguarding its environment for future generations to enjoy. This is achieved by:

- complying at a minimum with all relevant legislation;
- researching and applying best practices in environmental issues facing its sector ;
- evaluating and managing the environmental impact of current and potential future operations;
- conserving natural resources, including energy, raw materials and water; and
- implementing effective and responsible waste management and recycling procedures.

All employees within INM are encouraged to foster a spirit of social responsibility and support relevant environmental efforts undertaken by the INM Group.



Bribery and corruption

In order to protect our reputation and comply with local laws, we should never offer or take a bribe or act in any way that could be considered to be or to induce corruption. Bribes are anything of value including money, gifts, loans, favours, advantages, benefits in kind or entertainment that may influence a business or related decision or appear to do so. This is regardless of whether it is the norm within the country or industry that we are operating in. It applies to our dealings with government and public officials, customers, suppliers, auditors, unions, financial institutions and any other relevant stakeholders.

Small token gifts are acceptable when it is part of business customary practice but they should never be deemed to create an obligation. Cash or cash equivalents such as stocks, bonds and gift vouchers no matter how small should not be accepted or offered to avoid the appearance of bribery.

Political activities and contributions

The business has a general policy of not supporting political candidates or parties. Where an INM business believes that it is in the interest of the Group to support a political candidate or party, approval should be obtained in writing from the regional managing director and the group company secretary informed. Support can relate to direct financial aid but can also include providing benefits in kind or sponsorship. We do recognise the right of our employees to participate in legitimate political activities. These should be kept separate from INM activities. We should not use company assets or resources to support our private political interests.

Obtaining Advice and Raising Concerns

Raising a concern

At times we may have questions or require guidance on certain aspects of the code. It may be as simple as confirming that the current approach being adopted is the correct one. Alternatively we may be aware that the code is being violated and would like to speak to someone about it. The best place to start is by talking to our manager or supervisor. If you feel uncomfortable doing this then there are a number of other channels for raising concerns. These include:

- Local management team
- HR
- Internal Audit
- Group Company Secretary
- Group Chief Financial Officer

Within INM there is a policy of no retaliation. This means that INM will not penalise, or tolerate retaliation against any employee who reports a concern in good faith, even if that allegation is



found to be unsubstantiated.

While INM openly encourages its employees to raise concerns, any allegation that is made maliciously is considered to be a serious offence and may result in disciplinary action.

If you feel that you have been in violation of the code, you are urged to raise this matter immediately through one of the above channels. Admission of code violations will be looked on favourably, however the consequences of such violations will ultimately depend on the nature of the activity involved.

INM Ethics Helpline

There may be instances where we do not feel comfortable raising a concern internally. In such cases we should use the "INM Ethics Helpline". This is a telephone based reporting tool through which we can raise concerns relating to financial reporting, bribery and corruption. It is monitored solely by the Head of Internal Audit & Risk who is independent of INM's management team and reports directly to INM's Audit Committee. All employees can call 24 hours a day, seven days a week to report any concerns they may have.

The Head of Internal Audit & Risk monitors this voicemail and when a concern is raised through this channel Internal Audit will instigate an investigation of any issue arising.

When raising concerns through this channel you are urged to provide as much information as possible so that the concern can be thoroughly investigated. Employees are encouraged to disclose their name and are assured that all calls are treated discretely and effectively. If you do not feel comfortable doing this you may raise a concern anonymously.



Making Ethical Decisions

In some cases making an ethical decision can be very straightforward. However in other situations the decision may be more complicated. When evaluating an ethical dilemma we should ask ourselves the following questions:

- Does it feel right?
- Would I be happy if details of the situation were made public?
- Are any laws being broken?
- Is the health and safety of individuals being threatened?
- Could it harm INM's reputation?

Depending on answers to the above we should seek clarification or raise this concern through one of the appropriate channels.

Support

Further guidance on the area of fraud risk management within INM can be found in the following policies:

- INM Anti-Fraud Policy
- INM Bribery and Corruption Policy
- INM Code of Conduct

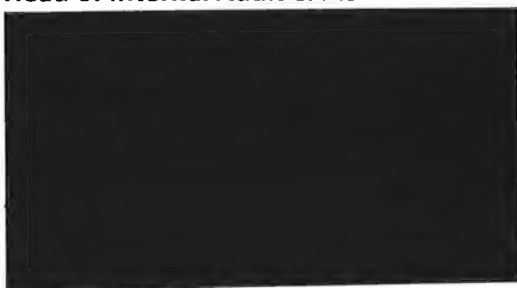


Contact Information

➤ **INM Ethics Helpline**



Head of Internal Audit & Risk



Group Company Secretary

